



**STATEMENT OF COMMON GROUND**

**BETWEEN**

**WEST BERKSHIRE DISTRICT COUNCIL**

**AND**

**HISTORIC ENGLAND**

**December 2023**

## **1.0 Introduction**

- 1.1 The purpose of this Statement of Common Ground (SoCG) is to set out areas of common agreement between West Berkshire District Council (WBDC) and Historic England (HE) and any areas of disagreement relating to the West Berkshire Local Plan Review (WBLPR) as well key strategic matters affecting the historic environment.
- 1.2 The duty to cooperate was created in the Localism Act 2011. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
- 1.3 Whilst the duty to cooperate is not a duty to agree, local planning authorities are required to make every effort to secure the necessary cooperation on strategic and cross boundary matters to support the Local Plan and its examination.
- 1.4 In relation to strategic planning matters, section 33A(1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with bodies (or other persons) within subsection (9) and paragraphs (a), (b) and (c) of subsection (1), in section 33A(1) of the PCPA 2004. This approach is also a requirement of national planning policy. Paragraph 35(c) of the National Planning Policy Framework seeks to ensure that the Local Plan is deliverable over the plan period, and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by a statement of common ground.
- 1.5 This Statement of Common Ground therefore provides the framework for West Berkshire Council's delivery of its duties and obligations under the Localism Act 2011 and accords with Paragraph 27 of the National Planning Policy Framework which requires LPA's to produce and publish one or more Statements of Common Ground. This is detailed further in the government's Planning Practice Guidance (PPG) on Plan-making.

## **2.0 Objective**

- 2.1 West Berkshire is the Local Planning Authority for its administrative area and Historic England is a statutory consultee and the government's advisor for the historic environment in England, seeking to ensure the protection of the historic environment.
- 2.2 This Statement of Common Ground sets out the confirmed points of agreement, or otherwise between the parties with regard to strategic planning matters arising from the proposals in the submission WBLPR.

In order to meet the requirements of the duty to cooperate, during the preparation of the Local Plan Review West Berkshire has engaged constructively with HE.

- 2.3 Historic England is a key strategic partner in the preparation of the WBLPR. This SoCG is a written record of the key matters addressed.

### **3.0 West Berkshire Local Plan Consultations**

- 3.1 The review of the Local Plan started in 2018 and included public consultation on the scope and content of the LPR, with a second round of consultation in November/December 2018. In December 2020 the Council published the full Regulation 18 emerging draft version of the LPR for public consultation from 11th December 2020 to 5th February 2021. All of the bodies and persons included on the planning policy consultation database were notified by email or letter and invited to comment. Between January and March 2023 the Council consulted on the Regulation 19 pre-submission Local Plan having considered comments and representations received at the Regulation 18 stage.
- 3.2 From an early stage in the Local Plan process, West Berkshire engaged Historic England about the range of issues around the Local Plan. Comments and representations have been made on reviewing the evidence base for the historic environment, which in turn aids in developing a strategy and vision, site selection, policy formation, and SA/SEA.
- 3.3 In response to the Regulation 18 scoping statutory consultation in February 2018 HE provided detailed advice on the approach to take regarding the historic environment, the SA and site selection. The Council acknowledged the importance of an adequate, up to date, and relevant evidence base. The comments made were taken forward in the development of spatial strategy and both relevant strategic and local policies.
- 3.4 In response to the Regulation 18 statutory consultation in December 2020 HE raised concerns regarding the lack of conservation area appraisals, and sought commitment through the Local Plan to publish appraisals. Comments were made in relation to the content and soundness of strategic policies relating to design, landscape character, historic environment, the strategic allocations at Sandleford and Thatcham, the site allocations, and non-strategic policies for conservation areas, listed buildings, non-designated heritage assets, registered parks and gardens, registered battlefields, areas of archaeological importance, and trees, woodland and hedgerows. Most policies were supported, and advice given where HE was concerned the policy was not sound or needed additional policy criteria. Specifically SP9 required amending to seek to enhance the historic environment, not only through new development, but also by positive action by the Council. Policy DC8 conservation areas was also a cause for

concern due to the lack of conservation area appraisals and the lack of commitment to undertaking them.

- 3.5 In response, amendments were made to SP9, SP17, DC8, and to other policies as highlighted above.
- 3.6 Historic England commented on the pre-submission draft of the West Berkshire Local Plan (Regulation 19) January 2023. Objections were raised to Policies SP9, SP17, RSA2, RSA17, RSA22 as unsound. Comments were made in relation to site allocation policies, and consistency of wording. Officers are currently working through the responses to the Regulation 19 consultation.

#### **4. On-going engagement between WBDC & HE**

- 4.1 Both parties met on 1<sup>st</sup> August 2023, together with the Council's archaeology officer to discuss the representations made by HE to the pre-submission version of the Local Plan. Appendix A lists the Council's comments and suggested amendments to each of HE's representations.

#### **5. Matters on which the parties agree**

- 5.1 HE supports the combination of detailed heritage policies in the Local Plan and consider most of the policies to be sound.
- 5.2 WBDC and HE agree to the suggestions and amendments made by HE. Appendix A highlights such comments, and range from typographical errors, to consistency of wording a criterion, to including additional requirements of a proposed development. Modifications will be suggested to accommodate HE's representations.

#### **6.0 Areas of Disagreement**

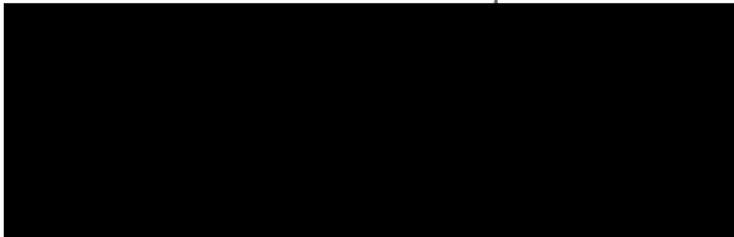
- 6.1 HE is concerned with the approach to site allocation policies RSA2 Land at Bath Road Speen and RSA17 Land at Chieveley Glebe, particularly in respect of the absence of a Conservation Area Appraisal (CAA) for both sites, and therefore the impact on the conservation areas in Speen and Chieveley. Resources mean that the timetable for undertaking CAAs are uncertain. However, the Council's Conservation team have devised a package of information and resources to aid town/parish councils in preparing CAAs. Officers are to consider raising the priority of Speen and Chieveley in its programme of CAAs across the District. Officers will be clarifying and undertaking further work to inform the proposed site allocation at Chieveley (RSA17). Modifications are also suggested to the policy criteria.

**7.0 Timetable for review and ongoing cooperation**

7.1 This SoCG will be kept under review and updated as necessary to reflect any change in circumstances or evidence as the plan progresses through the key stages to adoption.

**8.0 Agreement**

**Signed on behalf of West Berkshire District Council:**

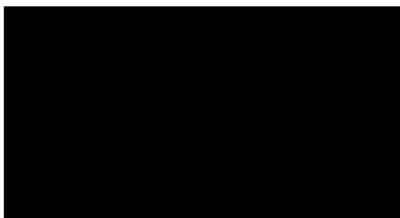


Katharine Makant.....

Chief Planning Officer

Dated: 05/02/2024.....

**Signed on behalf of Historic England:**



Historic England Planning Advisor

Dated: .....06/02/2024.....

## Historic England's comments on the Pre-Submission Draft of the West Berkshire Local Plan Review

### Strategic Policies

Page	Section	Soundness	HE comments	HE proposed change	Agreed position following meeting on 01/08/23
5	Para 3.4, part of the Plan's vision	Comment	We welcome reference to conserving and enhancing heritage assets. Note that the built environment is not synonymous with the historic environment. Therefore, we suggest addition of the word "historic" in the final sentence of this paragraph.	Heritage assets will be conserved and enhanced and there will be greater opportunity for enjoyment and appreciation of the special qualities of the built, <u>historic</u> and natural environment.	The Council to propose a <b>minor</b> modification to the LPR to amend as suggested
11	Objective 7	Comment	The heading of objective 7 is "Heritage" whereas the text refers to the built, historic and natural environment. We acknowledge the links between built, historic and natural assets and do not object to this wording; but we'd be happy to discuss this further as appropriate, if the Council wish to amend this in response to consultation feedback.	None	No changes to the LPR proposed
12	Para 4.6 and Figure 1	Comment	Reference should be made to Registered Parks and Gardens, for accuracy and consistency with the Policies Map. Figure 1 (or perhaps the Policies map?) should also include Scheduled Monuments.	In addition, there are other designations including conservation areas and <u>Registered historic</u> parks and gardens...	The Council to propose a <b>minor</b> modification to the LPR to amend as suggested
17	Policy SP1: Spatial strategy	Comment	The following sentence could be interpreted in more than one way: "The District's historic environment and environmental assets will continue to be protected and enhanced and used positively in development to establish a distinctive sense of place that nurtures human health and wellbeing." We infer it is intended to cover the District's historic environment and all environmental assets, including include both heritage and natural assets. However, if it is intended to focus only on its historic environment and heritage assets, a minor wording change is needed.		No changes to the LPR proposed
19	Policy SP2:	Sound	We support the proposed policy, including taking account		Historic England support

Page	Section	Soundness	HE comments	HE proposed change	Agreed position following meeting on 01/08/23
	North Wessex Downs AONB		of any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. We note this is supported by paragraph 4.28.		for policy welcomed
26	Policy SP5: Responding to Climate Change	Comment	<p>While we broadly support the proposed policy, including the intention we infer underlies criterion m, there are ways other than reversibility and minimum intervention that could enable improved environmental performance. So, the criterion as worded could be unintentionally constraining. We suggest simplifying the criterion as shown.</p> <p>Further work the Council may decide to undertake on measures that could enable the District to reach its net zero ambitions could reveal other principles that the Council may find useful.</p> <p>We advise also referring to a 'whole building approach' as stated in paras 5.55 and 10.92 of the submission plan.</p>	<p>Depending on the nature and scale of proposals, development will be expected to satisfy the following criteria:</p> <p>m. To maintain the integrity of the historic environment and to respect the character and improve the environmental performance of heritage assets without compromising their significance, <del>by adopting principles of reversibility and minimum intervention</del> in accordance with Policy SP9. <u>This necessitates taking a whole building approach informed by heritage expertise.</u></p>	The Council to propose a <b>minor</b> modification to the LPR to amend as suggested
33	Policy SP7: Design Quality	Comment	<p>We note and do not object to the changes to this policy since Reg 18.</p> <p>However, we suggest the Council considers referring to design guides or codes, notwithstanding the possibility that "community planning documents" may include such guides or codes.</p>	<p>Development proposals will be expected to show how they have responded positively to both national and local design guidance. At a national level this includes the characteristics of a well-designed place as set out in the National Design Guide (2021), or as superseded, and at a local level, this includes <u>neighbourhood plans, design guides or codes</u> and relevant community planning documents that identify the local character and distinctiveness of an area which is valued by local communities.</p>	The Council to propose a <b>minor</b> modification to the LPR to amend as suggested
35	SP8:	Sound	We support the proposed policy.		Historic England support

Page	Section	Soundness	HE comments	HE proposed change	Agreed position following meeting on 01/08/23
	Landscape character				for policy welcomed
37	SP9: Historic environment	<b>Unsound</b>	<p>As stated in our cover letter, we believe that the situation regarding CA Appraisals and Management Plans in West Berkshire merits explicit text in the Local Plan's <u>strategic</u> heritage policy, with supporting text (moved from paragraph 10.81 in the Development Management section). We suggest relevant wording for consideration, expanding on the opening two lines of policy SP9 and bringing in other examples of positive action.</p> <p>We note an “and” is missing at the end of criterion j for this collection of criteria linked with substantial harm to read as intended in the NPPF. An additional “and” is needed.</p> <p>Finally, we advise deleting the text on enabling development from both the policy and the support text. By definition within the NPPF, enabling development is development that is not otherwise in accordance with adopted policy. We are therefore of the view that including policy text on enabling development is not a necessary component of a local plan document. A local plan should adequately set out a positive strategy for the historic environment without the need to include such policy text.</p>	<p><i>1<sup>st</sup> para of policy</i> - Positive action will be taken to ensure that opportunities for the conservation and enjoyment of the historic environment are maximised. <u>For example, this will include, but not be limited to:</u></p> <ul style="list-style-type: none"> <li>• <u>producing conservation area appraisals and management plans;</u></li> <li>• <u>maintaining a local list of non-designated heritage assets; and</u></li> <li>• <u>maintaining a list of local heritage assets which are at risk, but which do not meet the criteria for inclusion on the national Heritage at Risk Register.</u></li> </ul> <p>The historic character, sense of place, environmental quality and local distinctiveness of West Berkshire will also be sustained and enhanced through new development, <u>including promoting heritage-led regeneration where appropriate and delivering public benefits from the District's archaeological resources.....</u></p> <p><i>5<sup>th</sup> para of policy</i> - Development which would lead to substantial harm to, or loss of, the significance of a designated heritage asset or its setting will not be permitted, unless – h.....</p>	The Council to propose a <b>main</b> modification to the policy and supporting text of SP9 to amend as suggested



Page	Section	Soundness	HE comments	HE proposed change	Agreed position following meeting on 01/08/23
				<p>i .....  j. No viable use of the asset can be found in the medium term through appropriate marketing that will enable its conservation; <u>and</u>  <u>k.....</u>  <u>l.....</u></p> <p><del>8<sup>th</sup> para of policy - Development proposals for enabling development which would otherwise conflict with other policies in the Local Plan but which would secure the future conservation of a heritage asset will be permitted where:</del>  i. <del>the proposals will not materially harm the heritage value of the asset or its setting;</del>  ii. <del>it can be demonstrated that alternative solutions have failed;</del>  iii. <del>the proposed development is the minimum necessary to protect the significance of the heritage asset;</del>  iv. <del>it meets the tests and criteria set out in Historic England guidance GPA4: Enabling Development and Heritage Assets;</del>  v. <del>it is subject to a legal agreement to secure the restoration of the asset prior to completion of the enabling development; and</del>  <del>it enables public appreciation of the saved heritage asset.</del></p>	
38	Para 5.45	Comment	It may be misleading to state the Council is solely responsible for identifying assets as non-designated heritage assets. As stated in the PPG, and indeed	Heritage assets include designated heritage assets and assets identified <del>by the Council,</del> 'non-designated'	The Council to propose a <b>minor</b> modification to the LPR to amend as

Page	Section	Soundness	HE comments	HE proposed change	Agreed position following meeting on 01/08/23
			supported by para 5.48 in the proposed Local Plan, there are a number of processes through which non-designated heritage assets may be identified.	heritage assets.	suggested
40	Para 5.54	Comment	The significance of a heritage asset includes its setting. A wording change is merited	Development proposals likely to affect the significance of a designated or non-designated heritage asset, <u>including the contribution to that significance made by its setting,</u>	The Council to propose a <b>minor</b> modification to the LPR to amend as suggested
40	Para 5.55	Sound	We welcome reference to taking a “whole building approach” regarding the retrofitting of historic buildings		Historic England support for approach welcomed
42	Policy SP10: Green Infrastructure	Sound	We welcome reference to the potential for green infrastructure to enhance access to the historic environment (e.g. through criterion j)		Historic England support for policy welcomed
60	SP16 Sandford Park, Newbury	Sound	We note and support the proposed criterion: “Development to be limited to the north and west of the site in order to respect the landscape sensitivity of the wider site and to protect the registered historic landscape and setting of the former Sandford Priory;”  We welcome reference to “Respect the landscape significance of the site on the A339 approach road into Newbury”		Historic England support for policy welcomed
63	SP17 Thatcham North East	<b>Unsound</b>	As explained in our cover letter, we advise more detailed articulation of the Council’s approach to the historic environment at this location. Also, the policy needs to refer to archaeological assessment, as outlined in our cover letter. We suggest revised wording for consideration.	Historic Environment Strategy to demonstrate how the <u>site’s historical development, archaeological remains and historic buildings and parkland will inform the scheme and help to create a sense of place. It should:</u> i. <u>be informed by proportionate heritage impact assessment, desk-based archaeological assessment and, if needed, field evaluation;</u> and ii. <u>articulate how the proposed scheme would support an appropriate future use of the Listed</u>	The Council to propose a <b>main</b> modification to the LPR to amend as suggested

Page	Section	Soundness	HE comments	HE proposed change	Agreed position following meeting on 01/08/23
				<u>Buildings in the area and minimise harm to their significance (including demonstrating listed buildings in the area will be conserved and how the impact of the development on their settings has been considered).</u>	

## DM Policies

Page	Section	Soundness	HE comments	HE proposed change	Agreed position following meeting on 01/08/23
155	DM4: Building Sustainable Homes and Businesses	Comment	We suggest further consideration is given to unpacking what is meant by a “suitable” location for renewable energy development. In our opinion, significant detail is not necessarily needed in the Local Plan; but it is likely to help future decision-making if there is greater clarity at this stage on the Council’s approach to identifying what “suitable” means, including with reference to the historic environment.		No changes to the LPR proposed
171	DM9: Conservation Areas Para 10.81	Comment	Our main concern, reflected in our letter in February 2021, concerns the large number of Conservation Areas in West Berkshire that do not have a CA Appraisal and, ideally, a Management Plan. To support further action on this, we suggest moving the text from paragraph 10.81 to the text supporting SP9 and adding relevant commitments to policy SP9.		Reinforce strategic approach to CAAs in LPR by amending text as suggested – <b>see SP9 for details.</b> Concerns about resources acknowledged and understood. As resources allow, agreed priority should be to concentrate programme of CAAs on areas across the District where development pressure is greatest. Agreed CAAs should be

					concise and map based.
172	DM10: Listed Buildings	Sound	We support the proposed policy and flag a minor typo towards the end of the policy – an “is” is not needed	<ul style="list-style-type: none"> <li>• unless justified to the satisfaction of the Council, that the proposed changes, loss or irreversible damage, and/or addition of new features to the Listed Building and its setting are:</li> <li>• Less than substantial in terms of impact/harm on the character and significance of the Listed Building and its setting; and</li> <li>• is off-set by the public benefit from making the changes, including enabling optimal viable use, and net enhancement to the Listed Building and its setting.</li> </ul>	The Council to propose a minor modification to the LPR to amend as suggested
173	Para 10.92	Sound	We welcome reference to taking a “whole building approach” to retrofitting energy efficiency measures in historic buildings		Historic England support for approach welcomed
174	DM11: Non-designated Heritage Assets	Sound	We support the proposed policy.		Historic England support for policy welcomed
176	DM12: Registered Parks and Gardens	Sound	We support the proposed policy.		Historic England support for policy welcomed
178	DM13: Registered Battlefields	Sound	We support the proposed policy.		Historic England support for policy welcomed
180	DM14: Assets of archaeological importance	Sound	We support the proposed policy.		Historic England support for policy welcomed

## Non-strategic Site Allocation Policies

Policy	Site	Soundness	HE comments	HE proposed change	Agreed position following meeting on 01/08/23
RSA1	Land north of Newbury College, Monks Lane, Newbury (Site ref HSA 1)	Sound	We note and support the proposed criterion: “Informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site”. The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.		The Council to review the language used across the RSA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: ‘Informed by <del>an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site</del> <u>the archaeological assessment already undertaken of the site.</u> ’
RSA2	Land at Bath Road, Speen, Newbury (Site Ref: HSA 2)	<b>Unsound</b>	<p>We note and support the proposed criterion: “Informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site”. The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.</p> <p>We note and support the proposed criterion: “Development will protect and enhance the special architectural and historic interest of the Speen Conservation Area”. We encourage the preparation of a Conservation Area Appraisal as a priority to support effective decision-making and implementation of this policy.</p> <p>In the meantime, we advise more detailed heritage assessment is done to inform the proposed allocation, as outlined in our cover letter.</p> <p>Though this site is carried forward from the adopted site allocations development plan document and at the time of writing a development proposal has been submitted for determination (23/00310), the site’s proximity to the conservation area does not appear to be mentioned in the Sustainability Appraisal. In principle we advise more detailed assessment to inform</p>		<p>The Council to review the language used across the RSA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: ‘Informed by <del>an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site</del> <u>the archaeological assessment already undertaken of the site.</u>’</p> <p>The Council to propose a <b>main</b> modification to the policy to better highlight the particular sensitivities of the Speen Conservation Area to ensure development on the site enhances or better reveals its significance as follows:            ‘h) iii) A tree planted landscape buffer to the A34, slip road and A4 to maintain the rural <u>and historic</u> character of the western approach into Newbury;            j) Development will protect and enhance the special architectural and historic interest of the Speen Conservation Area. <u>Particular attention will be paid to the design of the scheme when approaching the Conservation Area along Bath Road, responding sensitively to the character.</u></p>



Policy	Site	Soundness	HE comments	HE proposed change	Agreed position following meeting on 01/08/23
			<p>the allocation, given its proximity to the conservation area.</p> <p>We envisage particular sensitivities in the south west corner of the site, with the potential to impact on the rural character of the western approach to the conservation area. As the Council will know, it has a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.</p> <p>Also, paragraph 206 of the NPPF local planning authorities to look for opportunities for new development within Conservation Areas, and within the setting of heritage assets, to enhance or better reveal their significance.</p> <p>In addition, there is the opportunity for any scheme to respond positively to the local context i.e. the character of the conservation area to influence the character of the development in a positive way. For this to be realised, further evidence is needed on the relationship between this site and the conservation area.</p>		<p><u>density and scale of existing development.</u></p> <p>The Council to consider raising the priority of Speen in its programme of CAAs across the District.</p>
RSA5	Land at Lower Way, Thatcham (Site Ref: THA025)	Sound	<p>We note and support the proposed criterion: "Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.</p>		<p>The Council to review the language used across the RSA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: 'Informed by <del>an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site</del> <u>the archaeological assessment already undertaken of the site.</u>'</p>
RSA9	Land between A340 and The Green,	Comment	<p>The text associated with this allocation should refer to the listed milestone in the north east corner. It is listed GII and the plan should commit to its conservation and ensure it is given suitable setting,</p>	<p><u>The scheme will conserve the listed milestone and</u></p>	<p>The Council to propose a <b>main</b> modification to the LPR to amend as suggested.</p> <p>The Council to review the language used across</p>

Policy	Site	Soundness	HE comments	HE proposed change	Agreed position following meeting on 01/08/23
	Theale (Site Ref: HSA 14)		preferably in policy. While the milestone may be protected as a by- product of the scheme design, this needs to be made explicit.  Also, we note Englefield House, a Registered Park and Garden (GII) north west of the allocation. The Plan would be improved by acknowledging this nearby designated heritage asset.	<u>enhance its setting</u>	the RSA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: 'Informed by <del>an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site</del> <u>the archaeological assessment already undertaken of the site.</u> '
RSA10	Whitehart Meadow, Theale (Site Ref THE1)	Sound	We note and support the proposed criterion: "The scheme will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.		The Council to review the language used across the RSA policies to improve consistency and propose modifications to the LPR as appropriate. No minor modifications proposed for this policy.
RSA11	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)	Sound	We note and support the proposed criterion: "The scheme will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.		The Council to review the language used across the RSA policies to improve consistency and propose modifications to the LPR as appropriate. No minor modifications proposed for this policy.
RSA12	Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common (Site Ref: HSA15)	Sound	We note and support the proposed criterion: "The scheme will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.		The Council to review the language used across the RSA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: 'Informed by <del>an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site</del> <u>the archaeological assessment already undertaken of the site.</u> '
RSA13	Land north of A4 Bath	Sound	We note and support the proposed criterion: "A desk-based assessment to better understand archaeological		The Council to review the language used across the RSA policies to improve consistency and

Policy	Site	Soundness	HE comments	HE proposed change	Agreed position following meeting on 01/08/23
	Road, Woolhampton (Site Ref MID4)		potential and survival will be required. Subject to the results of the assessment, a field evaluation may be required". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.		propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: <del>'A desk based assessment to better understand archaeological potential and survival will be required. Subject to the results of the assessment, a field evaluation may be required</del> <u>Informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.'</u>
RSA14	Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)	Sound	We note and support the proposed criterion: "Development should be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site." The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.		The Council to review the language used across the RSA policies to improve consistency and propose modifications to the LPR as appropriate. There is the potential for this site to have high archaeological interest and so the Council will propose a <b>minor</b> modification to update the policy as follows: ... <u>Informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site. A pre-determination evaluation will be required.'</u>
RSA15	Land at Newbury Road, Lambourn (Site Ref: HSA 20)	Comment	We note and support the proposed criterion: "Development will be informed by an archaeological assessment in the form of a geophysical survey followed by trial trenching if necessary". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.		The Council to review the language used across the RSA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: <del>'Development will be informed by an archaeological assessment in the form of a geophysical survey followed by trial trenching if necessary</del> <u>the archaeological assessment already undertaken of the site.'</u>
RSA17	Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)	<b>Unsound</b>	We note the proposed criterion: "The development design and layout will be further informed by a Heritage Impact Assessment;" Leaving aside the redundancy of the word "further", we assert that the evidence base for this allocation is currently insufficient.	<u>The scheme will be informed by an archaeological desk based</u>	The Council to review the language used across the RSA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: <del>'The development design and layout will be</del>



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			<p>Chieveley conservation area does not currently have a conservation area appraisal. We advised in our letter of 5 February 2021 that a conservation area appraisal is needed as part of the plan-making process (i.e. prior to allocation), to inform development on this site. Our letter of 5 Feb recommended as a minimum that heritage impact assessment (HIA) is needed to inform the allocation. HIA would enable further consideration of the relationship between the site and nearby heritage assets, inform the approach to hedgerows (identified in the HELAA site assessment) and check some of the details in the HELAA, which states that Tudor Cottage and Coombe House are listed.</p> <p>The Sustainability Appraisal in Appendix 8b also notes that “The site is likely to have a negative impact on heritage assets as the site is adjacent to the conservation area with a number of listed buildings” and that “Survey work would be required and mitigation measures may be required.”</p> <p>Also, we note the HELAA site assessment recommends that some archaeological work to be undertaken, but this is not included in the criteria. e suggest it is added.</p>	<p><u>assessment as a minimum and field evaluation if required to assess the historic environment potential of the site</u></p>	<p><del>further informed by a Heritage Impact Assessment</del> <u>Informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.</u></p> <p>Following further assessment by the Council's Archaeology Officer, the Council to propose a main modification to amend as follows:  'b) Access will need to be obtained from East Lane. To achieve the sight lines of 2.4 x 43 metres, accesses may need to serve more than one dwelling. <u>The existing hedgerow fronting East Lane should be retained and enhanced as much as possible as part of the design.</u>  g) The development design and layout will be further informed by a Heritage Impact Assessment (HIA). <u>The development will protect and enhance the special architectural and historic interest of the Chieveley Conservation Area, with particular attention paid to the western end of the site adjoining the boundary of the Grade II listed The Old House.</u></p> <p>The Council to consider raising the priority of Chieveley in its programme of CAAs across the District.</p>
RSA18	Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22)	Comment	<p>We note and support the proposed criterion: “An archaeological desk based assessment will be required as a minimum and field evaluation if necessary to assess the historic environment potential of the site”. The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.</p> <p>While we welcome reference to special architectural and historic interest of the Compton Conservation</p>	<p><u>The scheme #</u> will also <u>conserve and enhance</u> <del>explain how</del> the special architectural and historic interest of the Compton</p>	<p>Historic England support for criterion welcomed. The Council to review the language used across the RSA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <u>minor</u> modification to update the policy as follows:  <del>'An archaeological desk based assessment will be required as a minimum and field evaluation if necessary to assess the historic environment potential of the site</del> <u>Informed by an</u></p>

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			<p>Area, the wording is currently ambiguous, with a lack of clarity about what “It” refers to, and we advise reference to “conserve and enhance”, rather than “take into account” which is weaker than required by legislation.</p> <p>We encourage the preparation of a CA Appraisal as a priority to support effective decision-making and implementation of this policy. Meanwhile, we note the existing Supplementary Planning Document that provides guidance on redevelopment of this site, including (based on our limited review) content on the significance of the conservation area.</p>	<p>Conservation Area and <u>protect its setting</u> <del>has been taken into account...</del></p>	<p><u>archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.</u></p> <p>In regard to the reference to the special architectural and historic interest of the Compton Conservation Area the Council to propose a <b>main</b> modification to the LPR to amend as suggested.</p> <p>The Council to consider raising the priority of Compton in its programme of CAAs across the District.</p>
RSA19	Land west of Spring Meadows, Great Shefford (Site Ref: GS1)	Sound	<p>We note and support the proposed criterion: “A desk-based assessment to better understand archaeological potential and survival will be required. Fieldwork techniques to better understand the Mesolithic potential may be necessary”. The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.</p>		<p>Historic England support for criterion welcomed. The Council to review the language used across the RSA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: <u>‘A desk based assessment to better understand archaeological potential and survival will be required. Fieldwork techniques to better understand the Mesolithic potential may be necessary. Informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.’</u></p>
RSA20	Land off Charlotte Close, Hermitage (Site Ref: HSA 24)	Comment	<p>We note and support the proposed criterion: “The development will be informed by a desk-based archaeological assessment followed by field evaluation if necessary”. The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.</p> <p>We are not entirely clear what is being referenced in</p>		<p>Historic England support for criterion welcomed. The Council to review the language used across the RSA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: <u>‘Informed by The development will be informed by a desk based archaeological assessment</u></p>

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			the Sustainability Appraisal when it refers to heritage benefits. We advise making these clearer in the Plan.		<del>followed by field evaluation if necessary</del> <u>the archaeological assessment already undertaken of the site.</u>
RSA21	Land to the south east of the Old Farmhouse, Hermitage (Site Ref HSA 25)	Comment	<p>We note and support the proposed criterion: “An archaeological desk based assessment will be required as a minimum and field evaluation if necessary to assess the historic environment potential of the site”. The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.</p> <p>We note the site does not mention Barnaby Thatch (GII) to the north. Proposals need to take account of this designated heritage asset and ensure that they avoid or minimise harm to its significance. We advise ensuring this is recognised in the policy.</p> <p>We are not entirely clear what is being referenced in the Sustainability Appraisal when it refers to heritage benefits. We advise making these clearer in the Plan.</p>	<u>Protect the setting of the nearby Listed Building (Barnaby Thatch)</u>	<p>Historic England support for criterion welcomed.</p> <p>The Council to propose a <b>main</b> modification to the LPR to amend as suggested.</p> <p>The Council to review the language used across the RSA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: <del>‘An archaeological desk based assessment will be required as a minimum and field evaluation if necessary to assess the historic environment potential of the site</del> <u>Informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.</u></p>
RSA22	Land adjacent Station Road, Hermitage	<b>Unsound</b>	<p>We note the proposed criterion: “A Heritage Impact Assessment will be required due to the presence of non-designated heritage assets.” This statement does not fully align with the HELAA site assessment. Assessment should also consider the site’s relationship with a nearby a Scheduled Monument (Grimsbury Castle) – a point that is not mentioned in the Sustainability Appraisal for the site. As a result, the wording of this requirement for heritage impact assessment will need to be amended, in discussion with the Council’s heritage advisers.</p> <p>We suggest revised wording for consideration. Furthermore, we are unclear on the rationale for not undertaking a DBA and if needed field evaluation on</p>	A Heritage Impact Assessment will be required due to the presence of non-designated heritage assets <u>and the nearby Scheduled Monument</u>	<p>The Council to a <b>main</b> modification to amend as follows: <u>‘A Heritage Impact Assessment will be required due to the presence of non-designated heritage assets and the nearby Scheduled Monument (Grimsbury Castle).</u></p> <p>The Council to review the language used across the RSA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: <u>‘The development will be informed by an archaeological desk based assessment as a</u></p>



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			this site, given the ridge and furrow system identified on the HER. To align with the NPPF, wording needs to be added on a requirement for archaeological assessment.	<u>(Grimsbury Castle)</u>  <u>The development will be informed by a desk-based archaeological assessment followed by field evaluation if necessary;</u>	<u>minimum and field evaluation if required to assess the historic environment potential of the site.'</u>
RSA25	Long Copse Farm, Enborne (Site Ref: TS2)	Comment	We are unclear if the potential impact on the setting of the 33 and 34, Church Lane (GII) has been considered. Notwithstanding the fact this is the continuation of an adopted policy, suitable mitigation may be needed along the western edge of the site, informed by heritage assessment. We suggest wording for consideration.	<u>Development will be informed by a Heritage Impact Assessment (HIA) to minimise any harm to the setting of 33 and 34 Church Lane.</u>	The Council to propose a <b>main</b> modification to the LPR to amend as suggested.
ESA1	Land east of Colthrop Industrial Estate, Thatcham (Site Ref: MID5)	Comment	We note and support the proposed criterion: "Development will be informed by an archaeological desk based assessment and field evaluation to assess the historic environment potential of the site;" In this case the phrasing implies that field evaluation will definitely be required; is that the case? The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.		Historic England support for criterion welcomed. The Council to review the language used across the ESA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: <del>'An archaeological desk based assessment will be required as a minimum and field evaluation if necessary to assess the historic environment potential of the site</del> <u>Development will be informed by an archaeological desk based assessment as</u>

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					<u>a minimum and field evaluation if required to assess the historic environment potential of the site.</u>
ESA2	Land west of Ramsbury Rd, Lambourn Woodlands (Site Ref: LAM6)	Sound	We support the proposed criterion: "Development will be informed by a Heritage Impact Assessment (HIA)", due to the presence of a nearby Scheduled Monument, to assess any assets linked with the former military airfield, and to consider the significance of Lyckwood Farm (GII) and any mitigation needed to reduce harm.		Historic England support for criterion welcomed. The Council to review the language used across the ESA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: <u>'Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.'</u>
ESA3	Land south of Trinity Grain, Lambourn Woodlands (Site Ref: LAM10)	Sound	We support the proposed criterion: "Development will be informed by a A Heritage Impact Assessment (HIA)", as amended to correct a minor typo.	Development will be informed by a A Heritage Impact Assessment (HIA)	Historic England support for criterion welcomed. The Council to propose a <b>minor</b> modification to the LPR to amend as suggested.  The Council to review the language used across the ESA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: <u>'Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.'</u>
ESA5	Northway Porsche, Grange Lane, Beenham (Site ref: BEEN10)	Sound	We note and support the proposed criterion: "Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site". The Council may wish to make wording on archaeological assessment		The Council to review the language used across the ESA policies to improve consistency and propose modifications to the LPR as appropriate. No minor modifications proposed for this policy.

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			more consistent across its site allocation policies, as highlighted in our cover letter.		
ESA6	Policy ESA6 Land adjacent to Padworth IWMF, Padworth Lane, Padworth (Site Ref: PAD4)	Comment	We note and support the proposed criterion: "Development will be informed by an archaeological desk based assessment field evaluation if required to assess the historic environment potential of the site;" In this case, wording changes are needed to ensure the criterion is clear i.e. is the DBA required and then field evaluation, if required. The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.		Historic England support for criterion welcomed. The Council to review the language used across the ESA policies to improve consistency and propose modifications to the LPR as appropriate. In this context the Council to propose a <b>minor</b> modification to update the policy as follows: 'Development will be informed by an archaeological desk based assessment <u>as a minimum and</u> field evaluation if required to assess the historic environment potential of the site.'